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Counsel to Argo Partners, Inc.; Avenue Capital  
Management, LLC; Contrarian Capital Management,  
L.L.C.; Hain Capital Group; King Street Capital  
Management, L.L.C., as Investment Manager  
to King Street Capital, Ltd., King Street Capital, L.P.  
and King Street Institutional, Ltd.; and Longacre Fund  
Management, LLC

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
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**VERIFIED STATEMENT OF KASOWITZ, BENSON, TORRES  
& FRIEDMAN LLP PURSUANT TO BANKRUPTCY RULE 2019(a)**

Kasowitz, Benson, Torres & Friedman LLP ("KBT&F"), submits this verified statement ("Verified Statement") pursuant to Federal Rule of Bankruptcy Procedure 2019(a), and states as follows:

1. KBT&F has been retained as counsel to the following entities (the "Trade Creditors") in connection with certain matters in the chapter 11 cases of the above-captioned jointly administered debtors (the "Debtors"):

- Argo Partners, Inc., which has an address of 12 West 37th Street, 9th Floor New York, NY 10018;

- Avenue Capital Management, LLC, which has an address of 535 Madison Avenue, 15th Floor, New York, NY 10022;
- Contrarian Capital Management, L.L.C., which has an address of 411 W. Putnam Avenue, Suite 225, Greenwich, CT 06830;
- Hain Capital Group, which has an address of Meadows Office Complex, 301 Route 17, 6th Floor, Rutherford, NJ 07070;
- King Street Capital Management, L.L.C., as Investment Manager to King Street Capital, Ltd., King Street Capital, L.P. and King Street Institutional, Ltd., which has an address of 65 East 55th Street, 30th Floor, New York, NY 10022; and
- Longacre Fund Management, LLC, which has an address of 810 Seventh Avenue, 22nd Floor, New York, NY 10019.

2. Collectively, the Trade Creditors currently hold approximately \$100 million of trade claims against the subsidiaries and affiliates of Delphi Corporation that the Trade Creditors acquired after the commencement of the Debtors' chapter 11 cases.

3. The Trade Creditors approached KBT&F to discuss the treatment of holders of trade claims during the Debtors' chapter 11 cases, and ultimately, in any proposed plan of reorganization. The Trade Creditors requested that KBT&F represent them in connection with the Debtors' chapter 11 cases.

4. Upon information and belief formed after due inquiry, KBT&F does not own any claims against or equity interests in the Debtors.

5. KBT&F reserves the right to revise and supplement this Verified Statement.

Dated: New York, New York  
August 16, 2006

KASOWITZ, BENSON, TORRES  
& FRIEDMAN LLP

/s/ David S. Rosner

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